

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433 (JRT/DJF)

**INTERROGATORIES IN AID
OF EXECUTION**

**INTERROGATORIES TO JUDGMENT
DEBTOR LINDELL MANAGEMENT LLC**

Pursuant to Federal Rules of Civil Procedure 26, 33, and 69, Robert Zeidman requests that Debtor Lindell Management LLC, (“Lindell”) answer the following interrogatories, separately and fully, and under oath, within 30 days of service, in accordance with those rules and the definitions and instructions set forth herein.

DEFINITIONS

1. The terms “you,” “your,” and “Lindell” mean Lindell Management LLC, its subsidiaries, divisions, predecessor and successor companies, affiliates, any partnership or joint venture to which it may be a party, and/or each of its employees, agents, officers, directors, representatives, consultants, accountants, and attorneys, including any person who served in any such capacity at any time during the relevant time period specified herein.

2. “Identify” when used in reference to an individual, means that you should state: (a) the full name of the individual; (b) the individual’s last known home or business address; and (c) the individual’s last known phone number.

3. “Identify” when used in reference to an entity, means that you should state: (a) the official name of the entity; (b) the address and telephone number of each place of business of the entity; (c) the state of residency of the entity; (d) the legal status of the entity; (e) the date of formation of the entity; (f) the federal tax identification number of the entity; and (g) any other business name(s) under which the entity operates.

4. “Identify” when used in reference to a document means that you should state: (a) the author of the document; (b) the type of document and any identification number assigned to the document; (c) the date appearing on the document and the date the document was created if different from the date appearing on the document; (d) the identity of each person who assisted in the preparation of the document; (e) the identity of all recipients of the document; (f) the present location of the document; (g) each person sharing custody or control of each copy of the document; and (h) if the document is a form, state the form name and number and the period during which that form was in use.

5. The terms “revenue” or “income” mean any and all money, earnings, revenue, or payments of any kind that you received in any form, whether in cash or

by check, credit or debit card, electronic transfer, or otherwise, including but not limited to payments for goods and services, payments on accounts receivable, loan repayments, interest income, rents, royalties, license fees, commissions, dividends, distributions, payments concerning sales of assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.

6. The term “asset” means any property or thing of value you owned, claimed, or held any interest in, in whole or in part, including any and all real property, tangible personal property including cash, vehicles, goods, inventory, machinery, equipment, trade fixtures, office equipment, supplies, and computer systems and networks, and intangible personal property including goodwill, contracts, accounts receivable, notes receivable, stocks, bonds, and other securities, ownership interest in any other entities such as subsidiary corporations, general or limited partnerships, and joint ventures, intellectual property rights including copyrights, patents, trademarks, and trade names, and insurance policies which you own or which name you as an insured.

7. “And” and “or” mean “and/or” and shall be construed in the conjunctive or disjunctive, whichever makes the given request more inclusive.

8. “Concerning” means about, regarding, containing, relating to, reflecting, referencing, recording, discussing, mentioning, noting, evidencing,

memorializing, analyzing, describing, commenting upon, referring to, having any connection with, supporting, contradicting, or having any tendency to prove or disprove the matters set forth in a given request.

9. The term “document” shall have the broadest meaning permitted by the Superior Court Civil Rules and includes, without limitation, all originals, copies (if the originals are not available), non-identical copies (whether different from the original because of underlining, editing marks, notes made on or attached to such copy or otherwise) and drafts of the following items, whether printed or recorded (through a sound, video or other electronic, magnetic or digital recording system) or reproduced by hand, whether or not claimed to be privileged or confidential, including but not limited to letters, correspondence, telegrams, telexes, memoranda, records, diaries, summaries of personal conversations or interviews, expressions or statements of policy, lists of persons attending meetings or conferences, reports or summaries of meetings, minutes or records or notes of meetings or conferences, reports or summaries of investigations, opinions of counsel, reports or summaries of either negotiations within or without the corporation or preparations for such, note pads, postcards, “Post-It” notes, stenographic notes, notes, notebooks, opinions or reports of financial advisors or consultants, opinions or reports of experts, projections, financial or statistical statements or compilations, contracts, agreements, appraisals, analyses, purchase orders, bills of sale, confirmations,

publications, articles, books, pamphlets, circulars, microfilm, microfiche, reports, studies, logs, surveys, reports to shareholders, instruments, circulars, press releases, drafts of any document, accounts, diaries, calendars, appointment books, maps, charts graphs, bulletins, photostats, speeches, brochures, manuals, data sheets, pictures, photographs, illustrations, blueprints, films, drawings, plans, tape recordings, videotapes, disks, diskettes, data tapes or readable computer-produced interpretations or transcriptions thereof; electronic communications including but not limited to email and/or text messages, voice mail messages, telegraphic messages, faxes, interoffice communications, advertising, packaging and promotional materials, and any other writings, papers and tangible things of whatever description whatsoever, including but not limited to any information contained in any computer, server, mainframe, or other storage device (including (i) information on or in computer memory, (ii) information on or in computer or network backup files, and (iii) information that has been “deleted” or “erased” but is recoverable) whether located on-site or at an offsite facility, within your possession, custody or control. Any comment or notation appearing on any document, and not a part of the original text, is to be considered a separate “document.” The term “document” also includes electronically stored information (“ESI”).

10. The term “ESI” means electronically stored information or data that is generated, received, processed, and recorded by computers and other electronic devices, and includes, without limitation, system metadata (e.g., author, recipient, file creation date, file modification date) and user-generated metadata (e.g., spreadsheet formulas). ESI further includes, without limitation, the following: (i) output resulting from the use of any software program, such as word processing documents, spreadsheets, database files, charts, graphs, and outlines, (ii) electronic mail and text messages, (iii) message logs from Google Chat, WhatsApp, Slack, AOL Instant Messenger, Instant Bloomberg, Facebook, Twitter, and similar programs, (iv) audio and video files, (v) internal (intranet) or external websites and (vi) activity listings of electronic mail receipts and/or transmittals. ESI includes electronic information or data wherever it resides, including, without limitation, (i) in an active file on a computer network or individual computer hard drive, (ii) in a deleted file or file fragment, (iii) on backup/storage media, (iv) on removable media, such as a floppy disk, memory stick, portable hard drive, or zip drive and (v) on a smart phone or personal digital assistant. ESI also includes documents, containers, and labels appended to or concerning any physical storage device associated with responsive electronic information or data.

11. The verb “concern” and its variants encompass the terms “refer,” “reflect,” and “relate,” and shall be construed to bring within the scope of the request

all documents that comprise, evidence, constitute, describe, explicitly or implicitly refer to, were reviewed in conjunction with, or were generated as a result of, the subject matter of the request, including but not limited to all documents that reflect, record, memorialize, discuss, evaluate, consider, review, report, support, demonstrate, show, study, describe, analyze, embody, mention, contradict, or result from the matter specified, or otherwise evidence, the existence of the subject matter of the request.

12. To the extent necessary to bring within the scope of the Interrogatories below any information or document that might otherwise be construed to be outside said scope, the word “any” means “any and all,” and the word “all” means “any and all.”

13. Pronouns shall be construed to refer to the masculine, feminine or neuter gender, in singular or plural, as in each case is most appropriate.

14. “Including” means “including but not limited to.”

INSTRUCTIONS

1. These Interrogatories are to be considered continuing in nature, and, therefore, answers should be modified or supplemented as you obtain further or different information.

2. Your answer to each Interrogatory shall include all information known to you or otherwise available to you, including information within the knowledge or

possession of any subsidiaries, parents or corporate affiliates of you, as well as information within the knowledge or possession of your attorneys, advisors, employees and accountants, as well as any other agent of any sort and whether present or past.

3. If the answer to any Interrogatory is fully and fairly contained in a document, from which the answer can without unreasonable difficulty be extracted, you may answer the interrogatory by attaching a copy of such document.

4. If any form of privilege or other protection from disclosure is claimed as a ground for withholding requested documents or information to be produced or identified, set forth with respect to the document or information the date, title, identity of the author (if applicable), subject matter and each and every fact or basis on which you claim your privilege, with sufficient specificity to permit the Court to make a determination as to whether the claim of privilege is valid.

5. If any Interrogatory is objected to on grounds of overbreadth, you are instructed to respond to the Interrogatory as narrowed to conform to your objection within the period allowed for a response.

6. Where a complete answer to a particular Interrogatory is not possible, answer the Interrogatory to the extent possible and state why only a partial answer is given. If, in answering these Interrogatories, you claim that the Interrogatory or an applicable instruction is ambiguous, set forth as part of the response the language

you claim is ambiguous and the interpretation you used to respond to the Interrogatory.

7. Unless otherwise stated, the relevant time period for these Interrogatories is from January 24, 2018 to the present.

INTERROGATORIES

1. Identify the name, address, and state of incorporation or organization of any corporate or other business entity you owned or operated during the relevant time period.

ANSWER:

2. Identify the shareholders, directors, officers, partners, members, managers, or other owners or operators of any entity identified in response to Interrogatory No. 1 above.

ANSWER:

3. Identify and describe your revenue during the relevant time period, including but not limited to all sources of income, revenue, or remuneration of any kind, including payments for goods and services, interest income, operating income, payments on accounts receivables, commissions, agency fees, loan repayments, rents, royalties, license fees, dividends, distributions, payments relating to sales of

assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.

ANSWER:

4. Identify and describe your routine expenses, including but not limited to: operating costs; rental obligations; payroll and benefits; outstanding loans; installment payments; mortgage payments; loan payments and financing charges on vehicles, boats, aircraft, equipment, and supplies; payments due under contracts; royalty payments and license fees; commissions owed to brokers, dealers, or representatives; legal, accounting, and other professional fees; advertising and marketing costs; and other routine debts and expenses that occur on a regular basis.

ANSWER:

5. Identify and describe all debts and liabilities you owed or incurred during the relevant time period, including:

- a. The name, address, and telephone number of the creditor.
- b. The amount owed.
- c. When the debt was incurred and for what reason.
- d. Whether all or any portion of the debt is paid.
- e. When all or any portion was paid.

f. Whether the debt is secured and, if so, how it is secured.

g. Any remaining balance on all such debts.

ANSWER:

6. Identify all legal actions in which you have been or are a party during the relevant time period, including: (a) the title of the case; (b) the name of the court/forum where the action is or was pending; (c) the case number; (d) a description of the case; and (e) the outcome of the case, if applicable (for example, a judgment for money damages against you or the other party).

ANSWER:

7. Identify all individuals, institutions, and other entities that owe you debts or liabilities, including: (a) the name, address, and telephone number of the debtor; (b) the amount of the debt or liability as of February 22, 2024; (c) whether the debt is secured, and if so, how; (d) the maturity date of the debt; (e) whether any debt has become uncollectable.

ANSWER:

8. Identify and describe all real property you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or

claimed any interest in, directly or indirectly, in whole or in part, during the relevant time period, including: (a) the property's address; (b) the purchase price; (c) the current fair market value; (d) the type of real property; (e) how the property is currently titled; (f) how the property was titled when first purchased; (g) your interest in the property; (h) the identity of any third parties who possess or claim to possess an ownership interest in the property; and (i) any debts, liabilities, liens, or other encumbrances against the property.

ANSWER:

9. Identify all banks, brokerage firms, investment firms, or other financial institutions for any account which you currently own, hold, or claim an interest in, in whole or in part, or owned, held, or claimed an interest in, in whole or in part, during the relevant time period, including:

- a. The bank, investment firm, or other financial institution name, address, and telephone number.
- b. The name under which the account is titled.
- c. The account number.
- d. The account type.
- e. The account balance from January 24, 2018 to present.
- f. The identity of any third parties who possess or claim to possess an ownership interest in the property.

- g. Any debts, liabilities, liens, or other encumbrances against the accounts.

ANSWER:

10. Identify and describe all vehicles, aircraft, boats, or other water vessels you currently own, hold, or claim an interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in whole or in part, during the relevant time period, including:

- a. The property's current location.
- b. The property's purchase price.
- c. The current fair market value.
- d. The type of property.
- e. How you acquired an ownership interest or claim in the property.
- f. Your current ownership interest or claim in the property.
- g. The identity of any third parties who possess or claim to possess an ownership interest in the property.
- h. Any debts, liabilities, liens, or other encumbrances against the property.

ANSWER:

11. Identify and describe any and all other tangible corporate property with a value over \$5,000 which you currently own, hold, or claim an interest in, directly

or indirectly, in whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in whole or in part, during the relevant time period, including:

- a. The type of property, including, but not limited to: goods; equipment and machinery; inventory; trade fixtures; tools; office equipment and furniture; computer equipment and networks; furnishings, appliances, electronics, computer equipment, televisions, stereos, audiovisual equipment, and fixtures; jewelry, artwork, antiques, and collectibles; clothing; cash; and precious metals.
- b. The property's current location.
- c. The property's purchase price.
- d. The current fair market value.
- e. How you acquired an ownership interest or claim in the property.
- f. Your current ownership interest or claim in the property.
- g. The identity of any third parties who possess or claim to possess an ownership interest in the property.
- h. Any debts, liabilities, liens, or other encumbrances against the property.

ANSWER:

12. Identify and describe all of your affiliates, subsidiaries, parent companies, or any other company that has or claims an interest in Lindell Management LLC, including the name, address or location, and state or country of incorporation organization of any such entity, and the nature of your affiliation or corporate or other organizational relationship with any such entity.

ANSWER:

13. Identify all corporations, subsidiaries, limited liability companies, trusts, partnerships, or other business entity of any kind or nature in which you currently own, hold, or claim an interest in, in whole or in part, or owned, held, or claimed an interest in, in whole or in part, during the relevant time period, and describe that relationship.

ANSWER:

14. Identify and describe all intangible property with a value over \$5,000 you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, including:

- a. The type of intangible property, including but not limited to any and all: contracts; security agreements; stocks, bonds, or other evidence of ownership, equity, or investment in any business entity, including number of units owned; patents, copyrights, trademarks, or other evidence of intellectual property rights; accounts receivable; notes receivable; corporate goodwill; research and development; retirement, pension, 401(k), and IRA accounts; annuities; and crypto currency.
- b. A description of the property.
- c. The property's purchase price (if applicable).
- d. The current fair market value.

- e. How you acquired an ownership interest or claim in the property.
- f. Your current ownership interest or claim in the property.
- g. The identity of any third parties who possess or claim to possess an ownership interest in the property.
- h. Any debts, liabilities, liens, or other encumbrances against the property.

ANSWER:

15. Identify all policies of insurance you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or were covered under during the relevant time period, including:

- a. The name, address, and telephone number of the insurance company.
- b. The policy number.
- c. The policy amount.
- d. The type of policy.
- e. The present cash or surrender value.
- f. The amount of accumulated dividends, if any.
- g. The time period covered under the policy.

ANSWER:

16. Identify all revenue, income, or assets you claim exempt from judgment enforcement in this action and state the basis for the exemption.

ANSWER:

17. As to each asset identified by you in response to these interrogatories, identify any third party that currently possesses, owns, or controls that asset, in whole or in part, such as:

- a. Corporate affiliates, subsidiaries, parent companies, partners, or any other related corporate entity.
- b. Banks, financial institutions, and brokerage firms.
- c. Accountants.
- d. Business partners.
- e. Associates with whom you conducted business during the relevant time period.
- f. Other individuals, institutions, and entities that hold your assets.

ANSWER:

18. Identify the asset or assets possessed, owned, or controlled, in whole or in part, by the third parties referenced in Interrogatory No. 17 above.

ANSWER:

19. Identify all transferees of any of your income or assets over the value of \$5,000, in whole or in part, during the relevant time period, or that are transferees of an ownership interest in any of your income or assets over the value of \$5,000, in whole or in part, during the relevant time period, including:

- a. Banks, financial institutions, brokerage firms, and investment firms.
- b. Accountants.
- c. Business partners.
- d. Associates.
- e. Other individuals, institutions, and entities.

ANSWER:

20. Identify the income or assets transferred to any third party, referenced in Interrogatory No. 19 above.

ANSWER:

Dated: February 22, 2024

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